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Applicant : Richard Meyer et al.  
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Alt. Ref.: P01-2203.05

### REMARKS

The Applicants appreciate the Examiner's careful consideration of the instant case and presentation of the cited references. However, after reviewing the cited art the Applicant respectfully submits as indicated below that aspects of the present invention are patentably distinct and in condition for allowance.

**Claims:** Claims 1–28 were rejected under 35 U.S.C § 102(e) as being anticipated by United States Patent Publication 2002/0007445 to Blumenau et al. (hereinafter “Blumenau”).

In general, Blumenau concerns problems associated with limiting host access to storage devices connected over a fibre channel (FC) network. (Abstract) It adds a level of access control using the existing FC standard protocol and, in particular, uses the WWN or nodename assigned at manufacture to host controller (paragraph 0077) Indeed, even if a host controller fails and is replaced; the new nodename assigned at manufacture to the new host controller is registered with the access control scheme in Blumenau and the old nodename in the system from the failed host controller is replaced. (paragraph 0082, 00107).

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Unlike the host controller, Blumenau does not mention using the nodename from a storage controller to limit or restrict access to one or any ports available on the system. (paragraph 0081). Blumenau purposely does not limit any host from accessing any storage controller or port in the FC network to keep the system flexible. For example, this generally allows any host to access any port on the network allowing for port independence (paragraph 0081) but also allows for load balancing and redundant access paths. (paragraph,0086, 0175) This arrangement also makes sense since limiting access to any ports on the network would violate the FC network protocol. (paragraph 0118)

Access control in Blumenau essentially works as follows. First, a system administrator creates a volume access table 82 as illustrated in Fig. 5 that includes a volume group name, a host controller port WWN (i.e., the nodename), a host controller port S\_ID (source address), a private/shared flag and a pointer to a volume list. (paragraph 0081) Details of this process are outlined in Fig. 7 to 10. Essentially, the system administrator enters the nodename of each host controller and defines a volume group name that generally reflects the name of the host (i.e., Host22-1) having access to the associated storage devices via the volume list pointer. (paragraph 0079). According to Blumenau, the volume group name made up by the system administrator is the one stable and unique identification in the system while the S\_ID changes each time the system boots and the nodename changes when there is a controller swapped out.

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Next, the host controller on a host logs into the fabric to get access to the volume group and storage devices assigned to the host. (paragraph 0081) Each host controller transmits its respective nodename or volume group name during the fabric login process. A name server or other component will assign a temporary S\_ID that is shorter than the nodename (paragraph 0069) to the host controller and it is also entered into the volume access table 82. (paragraph 0071, 0072, 0082) Both the host controller and the storage controllers have a copy or version of the volume access table 82 to limit access to certain assigned volume groups. For example, the limited set of volumes accessible to the host controller are defined in a vector stored on the host controller and define a 'disk spread'. (Abstract, paragraph 0076, 0085) Likewise, the host may attempt to access certain storage volumes but the storage controller will refer to the volume access table 82 or derivative copies thereof to ensure restricted data from the storage volumes is not given to the host controller. (paragraph 0010)

In view of the description of Blumenau above and our remarks below, the Examiner has not established the prima facie case as each and every element of independent claim 1 are not taught by the cited reference. See Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 U.S.P.Q.2D (BNA) 1913, 1920 (Fed. Cir.), cert. denied, 493 U.S. 853, 107 L. Ed. 2d 112, 110 S. Ct. 154